

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC'S PROPOSED VOIR DIRE QUESTIONS**

Defendant Google LLC submits the following proposed questions for voir dire for the Court's consideration:

1. Counsel for Plaintiff will introduce themselves and their client.
  - a. Do you know any of the attorneys or law firms?
    - i. Matthew D. Vella, Adam R. Doherty, Kevin Gannon, Brian Seeve, Aaron Jacobs, Jeffrey Pyle, Brian Dingman, and Daniel McGonagle of the law firm Prince Lobel Tye LLP;
    - ii. Kerry L. Timbers of the law firm Sunstein LLP.
  - b. Do you have any strong positive or negative opinions about any of these people or companies?
2. Counsel for Defendant will introduce themselves and their client.
  - a. Do you know any of the attorneys or law firms?
    - i. Nathan R. Speed and Anant K. Saraswat of the law firm Wolf, Greenfield, & Sacks P.C.;
    - ii. Robert Van Nest, Eugene Paige, Rachael E. Meny, Vishesh Narayan, Anna Porto, Deeva Shah, Eric K. Phung, and Spencer McManus of the law firm Kecker, Van Nest & Peters LLP;
    - iii. Michael S. Kwun and Asim M. Bhansali of the law firm Kwun Bhansali Lazarus LLP;
    - iv. Matthias A. Kamber of the law firm Paul Hastings LLP;
    - v. Jordan D. Segall of the law firm Munger Tolles & Olson LLP.
  - b. Do you or does anyone in your family work for Google LLC?
  - c. Do you have friends that work for Google LLC?

- d. Do you have any strong positive or negative opinions about Google or its senior executives, its products or its services?
3. Here is a list of potential witnesses who may testify at trial. Do you know any of these people?
- a. Joseph Bates
  - b. Stephen Boyd
  - c. Jeffrey Dean
  - d. Obi Felten
  - e. Philip Green
  - f. John Gustafson
  - g. Michael Holzrichter
  - h. Philip J. Isaak
  - i. Norman Jouppi
  - j. Sunil P. Khatri
  - k. Naveen Kumar
  - l. Miriam Leeser
  - m. James Loudan
  - n. Matthew Mabey
  - o. KC Mares
  - p. James Maccoun
  - q. Andrew Ng
  - r. Mustafa Ozgen
  - s. Nishant Patil

- t. David Patterson
  - u. Andrew Phelps
  - v. Kamran Shafiei
  - w. Tammo Spalink
  - x. Laura Stamm
  - y. Andrew Swing
  - z. Astro Teller
  - aa. Catherine Tornabene
  - bb. Martin Walker
4. Have you previously served as a juror? If yes, when? Was the case civil or criminal? Were you the foreperson? Did the jury reach a verdict in the case(s)? Did your experience affect your view of the justice system?
  5. Do you have strong feelings, positive or negative, about large corporations?
  6. The companies involved in this case are technology companies. Do you have strong feelings, positive or negative, about technology companies?
  7. Is Google used extensively by yourself or your family?
  8. Have you or your family been satisfied with your experience in using Google?
  9. Do you or your employer use Google in any way as part of a business (e.g., advertising)?
  10. Do you have a legal background?
  11. Do you have any background or training in machine learning or artificial intelligence?
  12. Do you have any background or training in mathematics? Are you particularly

uncomfortable with mathematics or math concepts?

13. Do you have any education, training, or experience in patent law or other intellectual property law, such as copyright, trademark, trade secrets, or right of publicity law?
14. Do you have any strong positive or negative opinions about patent law or other intellectual property law, such as copyright, trademark, trade secrets, or right of publicity law?
15. Have you, any member of your family, or anyone close to you ever been involved in a dispute over a patent?
16. Does anyone here have experience with licensing an idea or a product to someone else?
17. Have you ever felt that an idea or creation was taken from you? What were the circumstances? Was there a lawsuit involved?
18. Do you or does anyone in your family own their own business (LLC or corporation)?
19. Have you or anyone close to you ever been involved in a lawsuit? If so, was it as a plaintiff or defendant, a witness, or something else? What kind of case was it, and when did it occur? Were they deposed? Was there a trial? What was the outcome of the case? Were you satisfied with the outcome? How did the experience affect your opinion of the legal system?
20. Have you read or heard anything about this case other than what you've heard here today?
21. Have you read or heard anything in the news about any lawsuits involving Singular

or Google?

22. Do you have any interest in the trial or the outcome of this case based on the information you've learned so far?
23. Do you know or recognize anyone else in the jury pool? If so, how do you know each other and will the relationship affect your ability to be impartial if both of you are selected as jurors?
24. If you are selected as a juror, will you listen to the views of the other jurors and work cooperatively with other jurors in order to reach a verdict?
25. Do you have any hearing, vision, mental health or physical health issues, or anything else going on in your life that would make it difficult for you to sit on this case and give it their full attention?
26. Do you have difficulty speaking, reading, writing, or understanding the English language?

Respectfully submitted,

Dated: December 29, 2023

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**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed